UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

OMNI INNOVATIONS, LLC, a Washington limited liability company; and JAMES S. GORDON JR. Plaintiffs, v. SMARTBARGAINS.COM, LP, a Delaware Limited Partnership; Defendant.	No. CV 06-1129 JCC MOTION TO WITHDRAW OF PLAINTIFFS' COUNSEL NOTE ON MOTION CALENDAR: October 12, 2007

1. Eric C. Nelsen and Sayre Law Offices, attorneys for Plaintiffs OMNI INNOVATIONS, LLC, a Washington limited liability company, and JAMES S. GORDON JR., hereby move for leave to withdraw as Plaintiffs' counsel, pursuant to GR 2(g). Attorney Robert J. Siegel and i.Justice Law, P.C., who are not attorneys of record for Plaintiffs but who have an attorney-client relationship with Plaintiffs in relation to this matter, hereby similarly move for leave to withdraw.

2. Attached hereto and incorporated herein by this reference is the signed consent of Plaintiffs to withdrawal of counsel from this matter.

3. An "attorney will ordinarily be permitted to withdraw until 60 days before the discovery cutoff date in a civil case." GR 2(g)(4)(A). The discovery cutoff here is currently July 20, 2008, which is over 9 months from the date of consideration of this motion.

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4. The undersigned attorney hereby certifies, as required by GR 2(g)(4)(B), that he has advised Omni Innovations, LLC, and its principal, James S. Gordon, Jr., that the corporation is required by law to be represented by an attorney admitted to practice before this Court, and that failure to obtain a replacement attorney by the date the withdrawal is effective may result in the dismissal of the corporation's claims for failure to prosecute and/or entry of default against the corporation as to any claims of other parties.

SAYRE LAW OFFICES

/s/ Eric C. Nelsen

DATE: October 1, 2007. By:______________________________

Eric C. Nelsen
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Attorneys for Plaintiffs

i.Justice Law, P.C.

/s/ Robert J. Siegel

DATE: October 1, 2007. By:______________________________

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Attorneys for Plaintiffs

CONSENT OF PLAINTIFFS TO WITHDRAWAL OF COUNSEL

The undersigned, Plaintiffs herein, hereby acknowledge service on them of the attached Motion to Withdrawal of Plaintiffs' Counsel, and further

Hereby consent to the withdrawal of Eric C. Nelsen and Sayre Law Offices, and Robert J. Siegel and i.Justice Law, P.C., as counsel for Plaintiffs in Omni v. Smartbargains.com, LP, Case No. CV 06-1129 JCC.

[signature] DATE: 10/1/07

James S. Gordon Jr.

OMNI INNOVATIONS, LLC

[signature] DATE: 10/1/07

By: James S. Gordon Jr., its
Managing Member

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CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2007, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Derek Alan Newman
derek@newmanlaw.com

Randall Moeller
randy@newmanlaw.com

and I hereby certify that on the date set forth above I also mailed by United States Postal Service, first-class postage prepaid, the foregoing document to the following non-CM/ECF participants:

None.

SAYRE LAW OFFICES

/s/ Eric C. Nelsen

DATE: October 1, 2007. By:______________________________

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